

**THE UNITED STATES DISTRICT COURT IN THE EASTERN  
DISTRICT OF PENNSYLVANIA**

**CIVIL ACTION FILE NUMBER 2021-cv-00128**

Derrick Jacobs

**Plaintiff  
Pro se**

v.

City of Philadelphia, et al.  
Philadelphia Police Commissioner Danielle Outlaw in her  
official and individual capacity, Deputy Police  
Commissioner Christine Coulter in her official and  
individual capacity, District Attorney Lawrence Krasner  
in his official and individual capacity, Assistant  
District Attorney Tracy Tripp in her official and  
individual capacity, Deputy Police Commissioner (now  
Chief Inspector) Dennis Wilson in his official and  
individual capacity, Inspector Benjamin Naish (now  
Deputy Police Commissioner) in his official and  
individual capacity, Inspector DF Pace in his Official  
and individual capacity and Lieutenant Jason Hendershot  
in his official and individual capacity, Lieutenant  
Patrick Quinn in his official and individual capacity.

**Defendants**

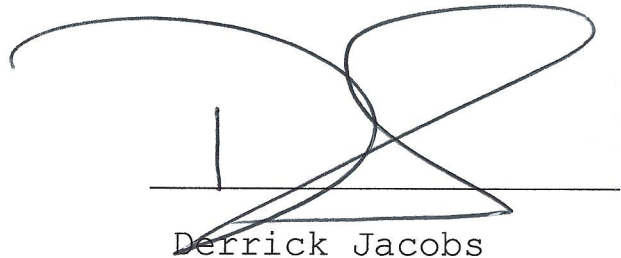
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**EMERGENCY INJUNCTIVE RELIEF**

COMES NOW, Plaintiff (pro se) Derrick Jacobs  
("Jacobs") to file his Complaint and seek Immediate  
Emergency Preliminary Injunctive Relief from violations  
of Section 1983 of the Civil Rights Act of 1871 42  
U.S.C. § 1983 ("Section 1983").

1. This action is brought by Plaintiff, Derrick Jacobs against the City of Philadelphia, et al seeking Emergency Injunctive Relief to prevent an ongoing violation of the plaintiff's Constitutional Rights.
2. The Plaintiff seeks Emergency Preliminary Injunctive Relief. The plaintiff seeks to be placed in Injured On Duty (IOD) status until adjudication, for the Defendants' violation of the Plaintiff's United States Constitutional Rights.
3. The Plaintiff also seeks to have all sick and vacation time used returned to the Plaintiff.
4. The defendant's actions will force the Plaintiff to retire from the Philadelphia Police Department or face an unconstitutional termination.
5. The Plaintiff has attempted to have the defendant's unconstitutional actions addressed.
6. The defendants have refused to address their unconstitutional actions.
7. This action is brought pursuant to 42 U.S.C. Section 1983 for violations of the Plaintiff's Constitutional Rights under the color of law.
8. The defendants have engaged in a conspiracy to constructively discharge the Plaintiff from the Philadelphia Police Department.
9. The Plaintiff has been forced to use HIS own sick and vacation time to avoid the illegal, arbitrary and capricious disciplinary actions initiated by the defendants.

10. The Plaintiff satisfies each of the elements for securing an emergency preliminary injunction. The Defendant's actions violates the First and Fourteenth Amendments and the Due Process of the United States Constitution, as well as Pennsylvania law, and thus the Plaintiff is likely to succeed on the merits of its claim; the Plaintiff will be irreparably harmed by defendant's illegal actions; Defendants cannot establish that an injunction will harm their case. The public interest strongly favors enjoining Defendants from continuing these acts that are unconstitutional, according to law.
11. The Plaintiff respectfully requests oral argument on this motion.

A handwritten signature in dark ink, appearing to read 'Derrick Jacobs', is written over a horizontal line. The signature is stylized with a large loop and a long horizontal stroke.

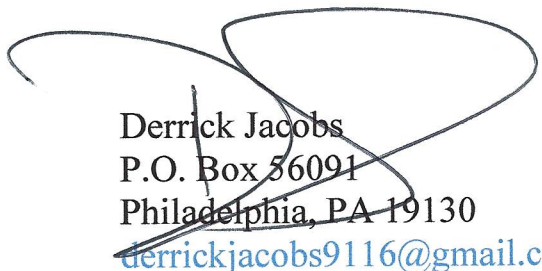
Pro Se

Plaintiff

## CERTIFICATE OF SERVICE

I, Derrick Jacobs, hereby certify that on January 14, 2021 a true and correct copy of the Pro Se Brief, was electronically served via ECF and/or email upon all parties of record listed below:

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*Plaintiff*  
*pro se*

**Date: January 14, 2021**